



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Alec Pointevint, Treasurer  
Republican National Committee-RNC  
310 First Street SE  
Washington, DC 20003

MAY 7 1997

Identification Number: C00003418

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

Dear Mr. Pointevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses a \$3,000,000 draw on your line of credit on Schedule C and C-1 from Signet Bank, which has not been recorded on Schedule A. Loans and loan repayments received must be reflected on Schedule A as well as on Schedule C. Please amend your report to clarify this discrepancy. 2 U.S.C. §§434(b)(3)(E) and (5)(D)

-Schedule C-1 of your report discloses the receipt of a draw on your line of credit extended by Signet Bank of \$3,000,000; however, Schedule C discloses the original amount of your outstanding obligation to be \$8,500,000. The Schedule C figure appears to incorporate past draws on the line of credit. Please amend your report to clarify this discrepancy. As loans must be continuously reported until extinguished, it may be necessary to amend the loan schedules for subsequent reports.

-Please clarify all expenditures made for media buys and production costs disclosed as shared administrative expenses on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Please identify the name and address of the recipient committee for the in-kind transfer disclosed on Page 5 of Schedule B supporting Line 22.

-Schedule F of your report discloses the Aggregate General Election Expenditure for Dole for President, Inc. to be \$9,296,239.57. However, FEC calculations disclose this amount to be \$9,313,710.68. Please amend your report to clarify this discrepancy.

-Schedule A of your report (pertinent portions attached) discloses an apparent contribution(s) from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. The Commission notes that you have included the federal identification number of IPALCO Enterprises, Inc.'s PAC; however, that committee's reports of receipts and disbursements show no such contribution made to the Republican National Committee.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

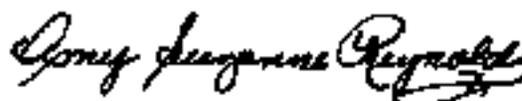
Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-As on several previous reports, Schedule H4 discloses payments for "shared" fundraising events which use an allocation ratio of either 100% federal or 100% non-federal as indicated on Schedule H2. The Commission

notes your consistent explanation of your committee's anticipation of receiving funds into both the federal and non-federal accounts as you prepare to begin each shared fundraising effort. Please be advised that the allocation regulations exist to allow the federal account to offset its expenditures for truly shared activities. In the future, it would be in the best interest of the committee to provide the original allocation ratio estimate for any event which was determined to benefit only one account at the end of the activity and to disclose any 100% federal disbursements on Schedule B supporting Line 21(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Amy Suzanne Reynolds  
Reports Analyst  
Reports Analysis Division

RUN DATE 10/22/96

REPUBLICAN NATIONAL COMMITTEE

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PERIOD 10/01/96 TO 10/16/96

ITEMIZED RECEIPTS  
SCHEDULE A LINE 11C

NAME ADDRESS	EMPLOYER OCCUPATION	SELF EMP	AGGREGATE YTD	DATE	AMOUNT
CAMPAIGN AMERICA 31711 N PENNSYLVANIA ST SUITE 100 CARMEL IN 46032	N/A PAC C00088369	N	1,000.00	10/11/96	1,000.00
THE CHASE MANHATTAN CORP FUND FOR GOOD GOVERNMENT 270 PARK AVENUE NEW YORK NY 10017	N/A PAC C00003830	N	2,000.00	10/11/96	2,000.00
<i>ARRS</i> IPALCO ENTERPRISES INC 25 MONUMENT CIRCLE INDIANAPOLIS IN 46204	N/A PAC C0115030	N	500.00	10/11/96	500.00 } <i>ARRS</i>
SYSTEMS (USA) INC 1401 HILLVIEW AVE PO B1, 112-A PALO ALTO CA 94304	N/A PAC C00219790	N	5,000.00	10/07/96	5,000.00

PAGE TOTAL 8,500.00  
GRAND TOTAL 8,500.00

